

December 27, 2012

Mr. Helder Gil
Legislative Affairs Specialist
Department of Consumer and Regulatory Affairs
1100 Fourth Street SW
Room 5164
Washington, D.C. 20024

Comments on DC's Proposed Food Truck Regulations

Dear Mayor Gray,

I have worked in DC for four years, first as an emergency communications consultant and recently as a food truck owner-operator. Seven months ago I left my consultant job to pursue my passion for cookies – an obsession that began when I was four. Lacking the capital to open a brick and mortar bakery, I bought a used Washington Post delivery van and spent a year retrofitting it as a mobile bakery, complete with oven, running water, freezer, refrigerator, etc. Besides baking and selling made-from-scratch cookies on the streets of DC, I supply businesses such as Sidamo Coffee & Tea and SOVA Espresso and Wine Bar with wholesale cookies.

In addition to myself, I employ part-time help on the cookie truck and have provided income to DC and NOVA residents who were otherwise unemployed. My first employee, a District resident, actually secured a job with a sustainable energy initiative after Captain Cookie and the Milk Man (the cookie truck) provided cookies for an office party.

Demand has been very strong and I hope to open a second truck and scout locations for a brick and mortar storefront in DC over the next two years. I work about 90-100 hours a week to make sure the cookie truck succeeds and have been able to support myself with that income. I can't express what a joy it is to be working in my life's passion and making people happy.

Because my career depends directly on the DC regulatory environment, I read DC's proposed new regulations with enthusiasm. I applaud the proposed removal of the "ice cream truck rule" and the ability to purchase employee badges – these will help legitimate businesses avoid conflicts with officers and maybe help me to relax to a reasonable 60-80 hours a week.

However, my livelihood is threatened by other aspects of the regulations, particularly the requirement that vending locations have 10 feet of 'unobstructed' sidewalk. Most of my current locations would be disqualified by this requirement, and many customers who rely on me for fresh-baked cookies would be unable to purchase them. If I can't serve 80% of my current customers, chances are good that I can't stay in business and would have to go back to consulting. Let's be honest – does DC need another consultant, or does DC need a mobile cookie bakery? Most people would pick the mobile cookie bakery.

One other concern with the new regulations is the powers given to the District of Columbia Department of Transportation (DDOT). DDOT is not an elected body and the plans for MRVs have the potential to stifle competition by limiting the numbers of food trucks in popular areas, or excluding trucks who are not able to obtain an MRV. The MRV model of four-hour parking doesn't necessarily work for all types of trucks – some may serve their customers best by stopping in for an hour or two, or rotating locations without MRVs, or moving between multiple MRV areas of DC in a given day. I welcome the opportunity to purchase a four-hour parking permit for DC meters but not at the risk of outlawing other legal parking spots for mobile vending.

Please reconsider the 10 foot sidewalk rule and the proposed MRV implementation. I truly have not seen pedestrians unable to make their way through popular food truck areas due to customer lines. On the whole, everyone is well-behaved and foot traffic is not obstructed.

Thank you very much for your time spent reading comments and writing the food truck regulations. Thousands of food truck customers and workers are hoping you'll leave food trucks in a position to serve their delicious food in DC!

Sincerely,

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